

Hi Steve

Thanks for sending me the draft report. I was pleased to see the attention to the life cycle analysis of various biofuels and the impact they will have on greenhouse gas emissions.

While most advanced biofuels will not substantially impact green house gas emissions for some time, forest derived biomass energy can significantly replace fossil fuel with renewable fuel in a relative short time. The draft does not adequately focus on the potential of forest derived biomass and the benefits to the Commonwealth of producing renewable energy within the state. The Massachusetts Sustainable Forest Bioenergy Initiative has produced a number of reports including a potential economic impacts study. The RPS is driving demand for biomass-generated electricity in New England but that energy does not have to be generated in the state where it is consumed. Other reports produced by the Sustainable Forest Bioenergy Initiative show the significant amount of biomass available in Massachusetts. In the 5 western counties biomass fuel from existing operations including logging residues, forest products manufacturing residues and wood from land clearing and right of way maintenance produces 630,000 green tons/year. Forest growth exceeds harvest and mortality and is also available for biomass energy production. Just half of the net growth in the five western counties of Massachusetts would add another 626,000 tons. If this wood was burned in large biomass energy plants it would support two 50 megawatt generators of renewable carbon neutral energy. It could be burned more efficiently in smaller heat and power plants if regulations and policies supported them.

Unlike other forms of renewable energy like wind and solar, biomass can be removed from the state and burned by our neighbors. Currently most of our other forest products are trucked out of state and provide little economic benefit to the Commonwealth. If the state does not aggressively support biomass energy development our largest renewable resource will be trucked out of state as well. Conversely, if biomass energy plants are built in the state a great deal more wood is available in the counties that surround the five western counties of Massachusetts and could supply even greater renewable energy production. The Sustainable Forest Bioenergy report calculates that fuel production and operation of these plants could produce 57 million dollars of economic activity annually. If the Advanced Biofuels Task Force does not focus on the development of biomass energy as a priority we will not only lose the resource to out of state production but we will also lose the economic development potential.

There are other important benefits to biomass energy in addition to satisfying the RPS, providing energy security and economic development: incentives for forest land protection. The state is currently losing thousands of acres of private forest land to conversion to development. Unlike the loss of forest land to agriculture that began over 200 years ago and ended with the re-growth of forest in the late 1800s this loss is permanent. The renewable nature of biomass and the capacity for forests to absorb carbon will encourage private forest land owners to choose long term management over liquidation and conversion to development. The public benefit that these forests provide including clean water, clean air, wildlife habitat and recreation are an additional benefit. State policies could encourage sustainable harvest levels and long term management that would assure both the public benefit of our forests and the renewable, carbon neutral fuel we need.

The Massachusetts Forest Landowners Association feels strongly that the Advanced Biofuels Task Force focus more directly on forest derived biomass energy. The economic opportunities and the resource are both at risk of being lost. The public benefits of forests are also in jeopardy. We would hope that the final report will consider the unique characteristic of this form of renewable energy ( that it can and will be taken out of state) as a priority. We also feel that it is important to look at the regulatory and policy opportunities to incentivize the most efficient use of forest derived biomass energy and the means to assure its sustainable production.